

ATTACHMENT A

STATEMENT OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

The Defendant, Stephen Bayne Fields, Jr., age 47, is a resident of Towson, Maryland. Between July 2018 and September 2018, the Defendant used multiple Facebook social media accounts to send and receive video and still images of children engaging, and being used to engage in, sexually explicit conduct via the Internet.

The Facebook accounts were under alias names that were variations of a name beginning with the letter "T" and each included images of an adult female by that name as profile photos. "T" was 20 years old at the time and was known personally to the Defendant. The Defendant obtained the profile photos for his alias accounts from a genuine Facebook account "T" used in her own name.

Through use of four alias Facebook accounts using "T's" name and photos, the Defendant knowingly sent and received child pornography on numerous occasions, to include the following:

While posing as "T" in July 2018, the Defendant sent messages to other Facebook users stating that he (or she) lived in Maryland and requesting "young girl pictures." On July 24, the Defendant received a video from another Facebook user. The video is approximately 45 seconds long and depicts a person inserting an object into a prepubescent female's vagina.

On July 24, 2018, the Defendant sent a video to another Facebook user. The video is approximately one minute and 44 seconds long, and depicts a naked prepubescent female who masturbates in front of the camera and then bends over and exposes her anus and vaginal area to the camera.

On August 4, 2018, the Defendant separately sent a video to two other Facebook profiles. The video is approximately 35 seconds long. It depicts a prepubescent male wearing only a shirt and laying on his back with his knees pulled up, and an adult male performing anal sex on the prepubescent male.

On August 9, 2018, the Defendant received a video from another Facebook user. The video is approximately one minute and 29 seconds long. It depicts a naked prepubescent male and an older naked minor male performing oral sex on one another. As the video continues, the older minor male performs anal sex on the prepubescent male.

On August 30, 2018, the Defendant (still using the name and likeness of "T") engaged in correspondence with another Facebook profile under a name with the initials "A.G." During the exchange, A.G. stated that he was babysitting his seven-year-old niece and asked the Defendant

whether and where he should kiss his niece. The Defendant eventually responded, "Kiss her right on her pussy how about that," and later added, "Take a picture of it and let me see." A.G. asked, "U want me to force her to let me[?]" and the Defendant responded, "Yes." After the Defendant stated, "Just do it and come on," A.G. asked, "Do what kiss her pussy or her neck[?]" The Defendant replied "Pussy," added "Show me her pussy" and agreed to send a video of himself (or herself) masturbating in exchange.

The Defendant then received from A.G. two videos, each depicting an adult male engaging in either anal or vaginal sex with a prepubescent female. The first video is approximately 13 seconds long, and the second video is approximately 9 seconds long. During the exchange, the Defendant sent A.G. pornographic material depicting persons whose status as minors could not be confirmed with certainty, and A.G. asked the Defendant to "[s]end more."

The correspondence between the Defendant and A.G. continued on August 31. On that date, A.G. stated that he was having sex with his niece, and the Defendant responded, "Yeah right prove is [*sic*]," "Show me," and "Let me watch."

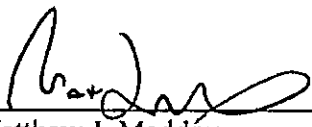
On September 3, 2018, the Defendant sent a video to another Facebook user. The video is approximately 23 seconds long and depicts a minor female touching her exposed vaginal area while performing oral sex on an adult male. As the video continues, the adult male penetrates the minor female's vagina with his fingers. The Defendant sent a message to the other Facebook user stating that "the girl is 10."

On September 13, 2018, the Defendant sent a still image to another Facebook user. The image depicts a prepubescent female sitting with one leg up and wearing only a shirt, with her vaginal area exposed to the camera. On the same date, the other Facebook user sent a video to the Defendant. The video is approximately two minutes and four seconds long, and depicts a male engaging in anal sex with a prepubescent male while simultaneously masturbating the prepubescent male. The prepubescent male is naked from the waist down.

Law enforcement became aware of the Defendant's alias Facebook accounts through a series of Cybertipline reports made to the National Center for Missing and Exploited Children by Facebook. Internet Protocol addresses used in August 2018 to access three of these accounts were subscribed by the Defendant at his residence in Towson.

Law enforcement obtained a warrant to search the residence and seized a laptop computer and other electronic devices during the search. Examination of the laptop computer revealed Internet search history indicative of searches for child pornography in or about 2013.

SO STIPULATED:


Matthew J. Maddox
Assistant United States Attorney

Stephen Bayne Fields Jr. 7/6/19

Stephen Bayne Fields, Jr.
Defendant

Mark Van Bavel 7/6/19

Mark Van Bavel, Esq.
Counsel for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

STEPHEN BAYNE FIELDS, JR.,

Defendant

*
*
*
*
*
*
*
*

CRIMINAL NO. DKC-19-085

UNDER SEAL

This is not a cooperation agreement.